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CLERK U.S. DISTRICT COURT
WEST. DIST. OF PENNSYLVANIA

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA)
)
v.) Criminal No. 17-65
) (18 U.S.C. § 287)
JUSTIN A. TOLLEFSON)

INFORMATION

The United States Attorney charges:

INTRODUCTION

1. At all times material hereto, beginning in and around January 2014, fraudsters intruded and "hacked" a database of personally identifiable information belonging to thousands of current and former UPMC employees.

2. At all times material hereto, conspirators of the hackers filed approximately 1,327 false 2014 federal income tax returns in which they claimed and placed approximately $3,012,000 in federal income tax refunds onto Amazon.com gift cards.

3. At all times material hereto, the defendant, JUSTIN A. TOLLEFSON, unlawfully obtained personally identifiable information in the names of four of the UPMC employees, who are residents of Western Pennsylvania, which included names, dates of birth, social security numbers, and wage information.

4. At all times material hereto, the defendant, JUSTIN A. TOLLEFSON, was an enlisted staff sergeant in aviation ordnance at Joint Base Lewis-McChord in Tacoma, Washington.

5. At all times material hereto, the defendant, JUSTIN A. TOLLEFSON, created unauthorized Ally Bank accounts in the names of the four UPMC employees for the purpose of receiving unauthorized electronic tax refunds.

6. At all times material hereto, the defendant, JUSTIN A. TOLLEFSON, prepared four false Form 1040 federal income tax returns, in which he used the names and social security numbers of the four UPMC employees.

7. At all times material hereto, the defendant, JUSTIN A. TOLLEFSON, falsified the federal tax returns for the purpose of causing an electronic tax refund to be issued in the name of the employee.

8. At all times material hereto, the defendant, JUSTIN A. TOLLEFSON, created a user account with TurboTax for the purpose of filing the false electronic tax returns.

9. On or about February 2, 2014, February 3, 2014, and February 4, 2014, the defendant, JUSTIN A. TOLLEFSON, electronically filed four false form 1040 income tax returns using TurboTax for the purpose of obtaining unauthorized federal income tax refunds.

COUNTS ONE THROUGH FOUR

10. The United States Attorney incorporates by reference paragraphs 1-9, as though set forth more fully herein.

11. On or about the following dates set forth below, in the Western District of Washington and elsewhere, the defendant, JUSTIN A. TOLLEFSON, did make and present to an agency of the United States of America, namely, the Department of the Treasury, a claim upon and against the United States which the defendant, JUSTIN A. TOLLEFSON, knew to be false, fictitious and fraudulent, in that the defendant, JUSTIN A. TOLLEFSON, as set forth below, electronically filed four false 2014 Forms 1040 federal income tax returns in the names of other persons in which a tax refund was claimed whereas, in truth and fact, as the defendant well knew, each such claim was false, fictitious and fraudulent, each such claim being a separate count herein.

Count	Date	Victim	Refund Claimed
1	2/2/14	L.G.	$12,840.00
2	2/2/14	B.D.	$14,765.00
3	2/3/14	J.G.	$15,626.00
4	2/4/14	P.T.	$13,102.00

In violation of Title 18, United States Code, Section 287.

SOO C. SONG
Acting United States Attorney
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